

REMARKS

Claims 9-32 are pending in the application. The Examiner has rejected claims 9-20 and 24-29 under 35 U.S.C. § 102(b) as being anticipated by Suver and claims 21-23 and 30-32 under 35 U.S.C. § 103(a) as being unpatentable over Suver in view of Bowker. Applicants respectfully disagree.

Applicants' technology relates to a table data structure that has different columns for each row of the table that is based on the value for that row in a type column of the table. For example, referring to the table on page 36 of applicants' specification, which is duplicated below, the type column is shown to the left of the table identifies the types of "Pers" and "Dept." The rows of type "Pers" include the columns "SSN," "Name," and "Salary," whereas the rows of type "Dept" include the columns "Name," "ID," "Phone," and "Floor." Thus, each row has a set of columns that varies based on the value in the type column for that row.

Dept:	<i>Name</i>	<i>ID</i>	<i>Phone</i>	<i>Floor</i>
	Payroll	P	2345	3
Dept:	<i>Name</i>	<i>ID</i>	<i>Phone</i>	<i>Floor</i>
	Payroll-Temps	P2	2244	1
Pers:	<i>SSN</i>	<i>Name</i>	<i>Salary</i>	
	123456789	Smith	44444	
Pers:	<i>SSN</i>	<i>Name</i>	<i>Salary</i>	
	234567890	John	55555	
Dept:	<i>Name</i>	<i>ID</i>	<i>Phone</i>	<i>Floor</i>
	Payroll-NJ	P3	2345	4
Dept:	<i>Name</i>	<i>ID</i>	<i>Phone</i>	<i>Floor</i>
	Engineering	E	7654	6
Pers:	<i>SSN</i>	<i>Name</i>	<i>Salary</i>	
	111111111	Sue	66666	
Dept:	<i>Name</i>	<i>ID</i>	<i>Phone</i>	<i>Floor</i>
	ReEngineering	E2	2244	3
Dept:	<i>Name</i>	<i>ID</i>	<i>Phone</i>	<i>Floor</i>
	Marketing-US	MU	1818	4
Dept:	<i>Name</i>	<i>ID</i>	<i>Phone</i>	<i>Floor</i>
	Marketing-Europe	ME	9876	2

The claims recite this concept of varying the columns of a table for each row as "a type column containing a type value for each row, the type value of a row identifying

a row type, each type value identifying the columns of that row." (Claim 1, emphasis added.)

It is the Examiner's position that Figure 9 (reproduced below) of Suver shows such the varying of the columns within rows of a table. Applicants disagree. Presumably, the Examiner believes that that the "TABLE/TYPE NAME" column of the database dictionary table of Figure 9 corresponds to the claimed "type column." However, the rows of the table of Figure 9 are fixed and do not vary based on the value in "TABLE/TYPE NAME" column. For example, the first row of the table, which has the value of "CUSTOMERS" in the "TABLE/TYPE NAME" column, has the columns of "TABLE/TYPE NAME," "TABLE OR UDT?," "COLUMN NAME," "TYPE," "COLUMN ID," and "COLLECTION?," whereas the second row of the table which has "ORDERS" in the "TABLE/TYPE NAME" column as the exact same columns. Thus, the columns of the rows do not vary.

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Fig. 9

DATABASE DICTIONARY					
TABLE/TYPE NAME	TABLE OR UDT?	COLUMN INFORMATION			
		COLUMN NAME	TYPE	COLUMN ID	COLLECTION?
CUSTOMERS	TABLE	NAME	TEXT	1	NO
		ADDRESS	TEXT	2	YES
		CITY	TEXT	3	NO
		STATE	TEXT	4	NO
		ZIP CODE	NUMBER	5	NO
		PHONES	PHONE	6	YES
ORDERS	TABLE	CUST	REFTO	1	NO
		ORDER DATE	NUMBER	2	NO
		SHIP DATE	NUMBER	3	NO
		DETAILS	DETAIL	4	YES
PARTS	TABLE	PART NAME	TEXT	1	NO
		QTY ON HAND	NUMBER	3	NO
		QTY ON ORDER	NUMBER	4	NO
		PRICE	CURRENCY	2	NO
PHONE	UDT	PHONE TYPE	TEXT	1	NO
			TEXT	2	YES
DETAIL	UDT	PART	REFTO	1	NO
		QTY ORD	NUMBER	2	NO
			NUMBER	3	NO
SUPPLIERS	TABLE	TYPE STORE	TEXT	1	NO
		PHONES	PHONE	2	YES

The Examiner may believe that the different values within the "COLUMN NAME" column of Figure 9 correspond to the different columns. For example, the first row specifies a different set of values under the "COLUMN NAME" column from the second row. However, these different column names refer to columns not in the database dictionary table itself, but rather to columns of the tables in the actual database. The database dictionary table only describes the tables of the database. Thus, the row of the database dictionary with the value of "CUSTOMERS" in the "TABLE/TYPE NAME" column does not identify the columns of "that row" of the database dictionary itself, but rather the rows within that customer table of the database that is illustrated in Figure 6, which is reproduced below.

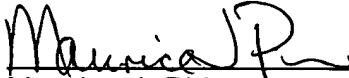
CUSTID	NAME	CITY	STATE	ZIP CODE	ADDRESS	PHONES						
121E	SUVER	SEATTLE	WA	12345	405 CASCADE STREET N.W.	<table border="1"> <thead> <tr> <th>PHONE TYPE</th><th>PHONE NUMBER</th></tr> </thead> <tbody> <tr> <td>WORK</td><td>823-456-7890</td></tr> <tr> <td>HOME</td><td>123-456-7890</td></tr> </tbody> </table>	PHONE TYPE	PHONE NUMBER	WORK	823-456-7890	HOME	123-456-7890
PHONE TYPE	PHONE NUMBER											
WORK	823-456-7890											
HOME	123-456-7890											
...						

The claims make it clear that a row with a type value identifies the columns of "that row" itself, whereas Suver's Figure 9 identifies the columns of a completely different table. Therefore, Suver neither teaches nor suggests that a column of a row contains a value that identifies the columns of that row as recited by the claims.

Based on the above amendment and remarks, applicants respectfully request reconsideration of this application and its early allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8548.

Respectfully submitted,
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